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January 12, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation
Narrowband PCS Proceeding
GEN Docket No. 90-314
ET Docket No. 92-100

Dear Mr. Caton:

On January 12, 1994, Mr. Roger D. Linguist, and Mr. Corey Linguist, both of PageMart, Inc., and the undersigned, attorney for PageMart, Inc., met with the following individuals to discuss the above captioned rulemaking proceeding: Mr. Bruce Franca and David Siddall, Office of Engineering and Technology. A background paper, copies of which are attached hereto, was provided to each individual.

Sincerely yours,

Susan E. Ryan
Susan E. Ryan

Enclosures

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**EX PARTE PRESENTATION
NARROWBAND PCS -- GEN DOCKET NO. 90-314**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

- o The Commission should reconsider its decision to grant narrowband PCS licenses on a Major Trading Area ("MTA") and Basic Trading Area ("BTA") basis.
- o Use of BTA/MTA service areas is not practical or cost-efficient for high powered messaging systems.
 - The FCC appears to be trying to draw a parallel with cellular and broadband PCS services, whose transmitters operate on low power.
 - Unlike those services, paging transmitters are typically high-powered, with signals that reach 20 or more miles in all directions.
- o MTAs are only equivalent in size to the service areas of wide-area local systems, and are thus too small to support the large regional systems that most paging service providers require.
 - Nothing in the FCC's auction rulemaking provides assurance that paging licensees will be able to aggregate MTAs to remedy this shortcoming.
 - Instead, licensees will be forced to buy up licenses from other carriers, at significant additional costs, both to the paging providers and, ultimately, to consumers.
- o The small BTA boundaries and the risk of interference along these boundaries will result in either the inefficient, uneconomic use of numerous low-powered transmitters, or in the complete inability to provide service for large portions of certain BTAs.
 - Use of fixed circles to define the service areas will result in large areas between the MTAs and BTAs that will go unserved.
- o ~~Service~~ areas must be expanded to encompass much larger geographic blocks.
 - By increasing the size of the service area designations, the number of boundaries and the number of coverage gaps could be significantly reduced, and service could be offered to a wider range of customers at lower costs.

Pursuant to 47 C.F.R. § 1.1206(a)(1), two copies of this document have been submitted to the Secretary of the Federal Communications Commission.

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